



District of Virginia.

II. THE SCHEME AND ARTIFICE TO DEFRAUD

3. From on or about October 2004 and continuing through on or about July 2006, in the Eastern District of Virginia, and elsewhere, the defendant, INGRID DINA LEVY, devised and intended to devise a scheme and artifice to defraud by obtaining money from individuals for orders of fashion clothing items by means of materially false and fraudulent pretenses and representations and either failing to deliver all items they ordered or failing to deliver any items at all. Over the course of her scheme and artifice to defraud, the defendant, INGRID DINA LEVY, fraudulently obtained at least \$85,044.14 from at least 44 victims.

4. During the scheme to defraud, the defendant used several different fashion clothing websites, including, but not limited to, WWW.PERSONALSHOPPER.NET, WWW.RUNWAYRENEGADE.COM, WWW.BUBBLEPOPSHOP.COM, and WWW.SHOPCHIC.NET.

5. As part of the overall scheme, defendant INGRID DINA LEVY utilized a number of aliases and fictitious names, including, but not limited to, "Dina Lev", "Lisa Bronstein", "Melanie Berenger", "Farrah Cinelli", "Warren Cross", "Helen Everhart", "Angie Gershon", "Clarisse Ghesquire", "Mike Herman", "Maria Johnson", "Dorothea Marques", "Grant Mathesson", "Jella Montague", "Isabella Rochas Rochas", "Saul Rubin", "Withney Sizemore", "Bruce A. Soenberg", "Prader and Soenberg LLP",

"Prater and Soenberg", "Bo", "Carla", "Denise", "Fallon", "Jayla", "Julie", "Kaylie", "Leona", "Malvina", "Mel", "Nicholas", "Shannon", "Shoshanna", "Sophia A.", "Trisha", and "EVY".

6. Also, as part of the overall scheme, defendant INGRID DINA LEVY utilized a number of electronic mail addresses, including, but not limited to, PersonalShoper@aol.com, ingridlevy@aol.com, bubblepopshop@aol.com, runwayrenegade@aol.com, fashionclick@aol.com, shopchicnet@aol.com, info@personalshoper.net, order@personalshoper.net, billing@shoplilie.com, service@shoplilie.com, admin@shopchic.net, checkout@shopchic.net, customerService@shopchic.net, info@shopchic.net, grant.mathesson@shopchic.net, mike.herman@shopchic.net, Status@shopchic.net, withney.sizemore@shopchic.net, wholesaleaccounts@shopchic.net, fashionglowinc@yahoo.com, ShopChic@fashionglow.com, shopchic@tmail.com and personalshoper@attwireless.blackberry.net.

7. Sometime in 2002, the defendant created an account with AOL for dial-up internet service and maintained that account at all times relevant to this indictment. This account, which was paid for by INGRID DINA LEVY, was provided by AOL, 22000 AOL Way, Dulles, Virginia 20166. The servers that support AOL's dial-up internet service were at all times relevant to this indictment located in the Eastern District of Virginia.

A. WWW.RUNWAYRENEGADE.COM

8. On or about October 2004, a resident of the Eastern District of Virginia, with the initials "AF," contacted the defendant, INGRID DINA LEVY, because she was looking to start an online fashion clothing business. The defendant agreed to supply AF with clothing for her online business. AF subsequently started WWW.RUNWAYRENEGADE.COM at the direction of and following instructions from the defendant. WWW.RUNWAYRENEGADE.COM was an Internet website advertising designer clothing for wholesale purchase.

9. WWW.RUNWAYRENEGADE.COM received electronic orders from customers, usually by means of electronic mail to runwayrenegade@aol.com. AF would collect either a check, money order, or wire transfer from the customer for their purchase; would e-mail these orders to the defendant; and would mail the defendant a check or money order for the amounts agreed upon with the defendant for the merchandise and shipping. Then, the defendant claimed to AF that she would dropship the ordered items directly to the customer. It was part of the scheme and artifice to defraud that the defendant would often not ship any merchandise. The defendant also would sometimes make partial shipments or ship alternate goods that were not ordered so that she would be able to claim to AF and customers that the order had been shipped.

10. On or about December 22, 2004, JB, CP and CG of Florida

placed an order at WWW.RUNWAYRENEGADE.COM for 200 "Juicy Girls Designer Products" with a sales price of \$10,000. JB, CP and ~~CG~~ <sup>CG</sup> ~~CG~~ <sup>BKG</sup> made a wire transfer of \$10,000 to AF's bank account located in the Eastern District of Virginia on December 22, 2004.

11. On or about December 27, 2004, AF deposited in the U.S. Mail in the Eastern District of Virginia a BB&T "Official check" payable to "DINA LEV" for \$8,000 to the defendant's then-residence on McDonald Ave, in Brooklyn, New York. The \$8,000 check was deposited into the defendant's HSBC bank account in Brooklyn, New York on December 28, 2004.

12. JB, CP and CG never received any merchandise. When they did not receive their order, they sent an email to AF at runwayrenegade@aol.com on January 22, 2005 complaining that they had not received their merchandise and that they consulted an attorney about taking legal action against WWW.RUNWAYRENEGADE.COM.

13. On or about January 25, 2005, AF told the defendant about JB, CP and CG's complaint. In a return email sent to AF in the Eastern District of Virginia on January 25, 2005, the defendant instructed AF to make a material misrepresentation to the victims that the name of AF's contact at her supplier was "Lisa Bronstein" when the defendant well knew that "Lisa Bronstein" was a fictitious person who did not work for the defendant and did not exist.

B. WWW.SHOPCHIC.NET

14. As further part of the scheme and artifice to defraud, the defendant registered the domain name WWW.SHOPCHIC.NET with Yahoo, Inc. on January 10, 2005. The defendant registered the contact information for the name as SHOP CHIC, 8721 Santa Monica Boulevard, Number 1058, Los Angeles, California 90069. This address actually belongs to the mailbox company "Mail Service Center," and Mailbox "Number 1058" was rented by the defendant. Two phone numbers were also listed in the registration information: one with a Los Angeles area code (310) and the other with a toll free exchange (866). Both of these telephone numbers were associated with the defendant, and voice mails from each were forwarded to personalshoper@aol.com, which was hosted on an AOL server located in the Eastern District of Virginia.

15. As part of the scheme and artifice to defraud, the defendant instructed "Mail Service Center" in Los Angeles to forward any mail received in rented box via United Parcel Service 2nd Day Air to her residences in New York.

16. On or about October 31, 2005, SA of Texas placed an order with WWW.SHOPCHIC.NET, (a web site solely operated by the defendant) for 130 pairs of designer jeans. Pursuant to instructions of the defendant for Order "#7-1170", SA mailed an American State Bank "Official check" in the amount of \$7,980 payable to "Levy" from Texas to 8721 Santa Monica Boulevard in Los Angeles, California. The \$7,980 check was deposited into the

defendant's HSBC bank account in Brooklyn, New York on November 7, 2005.

17. SA received 16 pairs of jeans, rather than the 130 pairs that she had ordered. SA sent emails to the defendant demanding a refund for the non-delivery of the remainder of the order. As part of the defendant's scheme and artifice to defraud, the defendant sent an email to SA on or about July 13, 2006 containing the following material misrepresentations: 1) that SA would receive a refund, 2) that someone from Shopchic Inc. would be contacting SA in 1-3 days, and 3) the email was signed by a fictitious person "Clarisse Ghesquire." No refund was ever provided, the remainder of the order was never fulfilled and SA was never contacted.

18. On or about December 28, 2005, an undercover agent placed an Internet order for twelve (12) track suits from WWW.SHOPCHIC.NET. On or about January 9, 2006, pursuant to instructions from the defendant, the undercover agent mailed a bank check from the Eastern District of Virginia in the amount of \$1,020.00 as payment for the twelve track suits to 8721 Santa Monica Boulevard, Number 1058, Los Angeles, California 90069. Receipt of the check was confirmed via e-mail received from WHOLESALE@SHOPCHIC.NET on January 13, 2006. The check for \$1,020.00 was deposited in the defendant's HSBC bank account on January 19, 2006. On February 8, 2006, the undercover agent received an electronic mail from WHOLESALE@SHOPCHIC.NET

misrepresenting that the order had "departed our premises" when the defendant well knew that no package, no merchandise or any refund was ever sent or received by the customer. The defendant also signed the email using the alias "Dorothea."

C. FALSE DOCUMENTS

19. As a further part of the scheme and artifice to defraud, the defendant created at least four fraudulent letters purporting to be from a fictitious California lawyer named Bruce Soenberg of Prater and Soenberg LLP, 7060 Hollywood Blvd., # 508, Los Angeles, California. The substance of the letters threatened websites which hosted negative reviews of the defendant's companies with legal action if they did not take down the negative ratings. The defendant created these letters when she well knew that "Bruce Soenberg" was a fictitious person and that the lawfirm "Prater and Soenberg" did not exist.

20. Also, as part of the scheme and artifice to defraud, the defendant created false documents entitled "Summons and Complaint" purporting to be official court documents filed by attorney "Bruce A. Soenberg" of the law firm "Prader and Soenberg, LLP" with the "Supreme Court, State of California, County of Santa Monica." On or about February 6, 2006, the defendant made a material misrepresentation in furtherance of her scheme to defraud when she delivered via email four fraudulent documents titled "Summons and Complaint" to a former customer with the initials of "AS", who lived in Germany. The defendant



fraudulently claimed that the false documents were evidence of a lawsuit filed by her company "Kutchner Group d.b.a. Shopchic" in the state of California against AS when the defendant well knew that the "Summons and Complaint" documents were falsely created by her, that the "Kutchner Group", "Bruce A. Soenberg" or "Prader and Soenberg, LLP" did not exist and that no law suit was ever filed by "Kutchner Group d.b.a. Shopchic."

Counts 1 through 3

(Mail Fraud)

THE GRAND JURY FURTHER CHARGES:

21. Paragraphs 1 through 20 of this Indictment are hereby re-alleged and incorporated as though set forth in full herein, as constituting and describing defendant's scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses and representations.

22. On or about the dates listed below, in the Eastern District of Virginia, and elsewhere, the defendant INGRID DINA LEVY, for the purpose of executing the aforesaid scheme and artifice to obtain money or property by fraud, and attempting to do so, did knowingly cause to be placed in an authorized depository for mail to be delivered by the United States Postal Service or by an interstate commercial carrier, according to the

directions thereon, a mailing further described below:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF MAILING</u>
ONE	12/27/04	A BB&T check payable to "DINA LEV" for \$8,000 mailed from the Eastern District of Virginia to 1967 McDonald Avenue, Brooklyn, New York.
TWO	10/31/05	An American State Bank "Official check" in the amount of \$7,980 payable to "Levy" mailed to 8721 Santa Monica Boulevard, #1058, Los Angeles, California 90069
THREE	1/9/06	A check payable to "LEVY" for \$1,020 mailed from the Eastern District of Virginia to 8721 Santa Monica Boulevard, #1058, Los Angeles, California 90069-4507

(all in violation of Title 18, United States Code, Section 1341.)

Counts 4 through 7

(Wire Fraud)

23. Paragraphs 1 through 20 of this Indictment are re-alleged as though fully set forth herein, as constituting and describing defendant's scheme and artifice to obtain property and money by means of material misrepresentations and fraudulent pretenses and representations.

24. On or about the dates listed below, in the Eastern District of Virginia, and elsewhere, the defendant INGRID DINA LEVY, for the purpose of executing the aforesaid scheme and artifice to obtain money or property by fraud, and attempting to do so, did knowingly transmit by wire in interstate and foreign

commerce, electronic mail, further described below,:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE TRANSMISSION</u>
FOUR	1/25/05	An electronic mail sent to AF in the Eastern District of Virginia instructing AF to tell customers JB, CP and CG that her contact's name at her supplier was the fictitious name of "Lisa Bronstein"
FIVE	7/13/06	An electronic mail sent to SA signed by a fictitious person "Clarisse Ghesquire" at wholesalea/ccounts@shopchic.net falsely claiming that SA would receive a refund <span style="float: right;">BKG</span>
SIX	2/06/06	Four electronic mails sent to AS containing scanned false documents purporting to be a "Summons and Complaint" filed in the "Supreme Court, State of California, County of Santa Monica"
SEVEN	2/08/06	An electronic mail sent to "Denise Nichols" in the Eastern District of Virginia falsely claiming that the "order has departed our <del>our</del> left our premises" <span style="float: right;">BKG</span>

(all in violation of Title 18, United States Code, Section 1343.)

FORFEITURE

25. Pursuant to Rule 32.2(a), the defendant INGRID DINA LEVY is hereby notified that, if convicted of any of the mail or wire fraud offenses charged in Counts One through Three above, she shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461(c), the following property:

(a) A sum of money equal to at least \$85,044.14 in United States currency, representing the amount of proceeds obtained as a result of the violation(s) of 18 U.S.C. §§ 1341, 1343.

(b) Pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), the defendant shall forfeit substitute property, up to the value of the amount described in subparagraph (a), if, by any act or omission of the defendant, the property described in subparagraph (a), or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty. The property subject to forfeiture as substitute assets includes, but is not limited to, the following:

(1) \$50,024.43 provided by the defendant in the form of a bank check payable to "MOBILE 5000" on May 5, 2006.

(In accordance with Title 18, United States Code, Section 981(a)(1)(c); Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

A TRUE BILL:

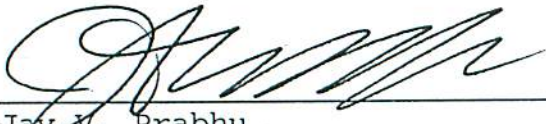
Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

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FOREPERSON OF THE GRAND JURY

DATE: January \_\_\_\_\_, 2008

CHUCK ROSENBERG  
United States Attorney



Jay V. Prabhu  
Assistant United States Attorney

Thomas Dougherty  
Trial Attorney  
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